

INTERVENTION



ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH, Chairman
BOB STUMP
ROBERT BURNS
DOUG LITTLE
TOM FORESE

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AZ CORP COMMISSION
DOCKET CONTROL

PETITION OF SAGE TELECOM
COMMUNICATIONS, LLC D/B/A
TRUCONNECT FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF ARIZONA ON
A WIRELESS BASIS (LOW INCOME ONLY)

DOCKET NO. T-20944A-15-0358

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105, the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

I Service

Please serve all documents on:

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Craig.Marks@azbar.org
Attorney for ALECA

Arizona Corporation Commission

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OCT 29 2015

II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;

- 1 • Gila River Telecommunications, Inc.;
- 2 • Hopi Telecommunications, Inc.;
- 3 • Midvale Telephone Exchange, Inc.;
- 4 • San Carlos Apache Telecommunications Utility, Inc.;
- 5 • South Central Communications;
- 6 • Table Top Telephone Company, Inc.;
- 7 • TDS;
- 8 • Tohono O'odham Utility Authority; and
- 9 • Valley Telephone Cooperative; and
- 10 • Zona Communications.¹

11 Each ALECA member, including its Tribally-owned members, receives support from the
12 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
13 discounted Lifeline telephone service and receives compensation for the discounts from the
14 FUSF. Sage Telecom Communications, LLC dba TruConnect ("TruConnect"), seeks
15 designation as an Eligible Telecommunications Carrier ("ETC") so that it may provide the
16 services identified in its Application to eligible customers in Arizona, including "including
17 Federally-Recognized Tribal Lands." Tribal Lands are not subject to the jurisdiction of the
18 Arizona Corporation Commission. Therefore, TruConnect's proposed service request raises
19 jurisdictional issues concerning the provision of services on tribal lands without authorization
20 from tribal regulatory authorities.

21 ALECA reserves the right to take positions on any other issues in this case.

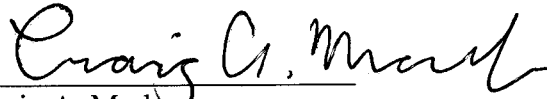
22 No other party can adequately represent ALECA's interests.

23 **III Requested Relief**

24 ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on October 29, 2015.

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15 **Original** and 13 copies **filed**
16 on October 29, 2015, with:

17
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
22

23 **Copy** of the foregoing **mailed** and **e-mailed**
24 on October 29, 2015, to:

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